

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>CHRISTOPHER ALEXANDER GLOVER,</b>	§	
<b>PLAINTIFF,</b>	§	
	§	
<b>VS.</b>	§	<b>CIVIL ACTION _____</b>
	§	<b>JURY DEMANDED</b>
	§	
<b>ROY JORGENSEN ASSOCIATES, INC.</b>	§	

**PLAINTIFF CHRISTOPHER ALEXANDER GLOVER'S,  
ORIGINAL COMPLAINT AND JURY DEMAND**

**NOW COMES** Christopher Alexander Glover, hereinafter called Plaintiff, complaining of and about Roy Jorgensen Associates, Inc. hereinafter called Defendant, and for cause of action shows unto the Court the following:

**PARTIES AND SERVICE**

1. Plaintiff Christopher Alexander Glover is a citizen of the United States and the State of Texas and resides in Harris County, Texas.

2. Defendant, Roy Jorgensen Associates, Inc., a Texas corporation is organized under the laws of the State of Texas, and service of process on the Defendant may be effected pursuant to sections 5.201 and 5.255 of the Texas Business Organizations Code, by serving the registered agent of the corporation, National Registered Agent at 350 North Saint Paul Street, Suite 2900, Dallas, Texas 75201.

**JURISDICTION**

3. The action arises under the Civil Rights Act of 1964, Title VII §701, 42 U.S.C. §2000e et. seq. as amended by the Civil Rights Act of 1991, Title I, § 104, 109(a) as hereinafter more fully appears.

4. This Court has supplemental jurisdiction over state law claims discussed below

under 28 U.S.C. Section 1367(a) because they arise out of the same case or controversy.

### **NATURE OF ACTION**

5. This is an action under Title 42 U.S.C. Section 2000e et. seq. as amended by the Civil Rights Act of 1991 to correct unlawful employment practices on the basis of religion.

### **CONDITIONS PRECEDENT**

6. All conditions precedent to jurisdiction have occurred or been complied with: a charge of discrimination was filed with the Equal Employment Opportunity Commission within three-hundred days of the acts complained of herein and Plaintiff's Complaint is filed within ninety days of Plaintiff's receipt of the Equal Employment Opportunity Commission's issuance of a right to sue letter.

### **FACTS**

7. Beginning on or about February 10, 2010 the Plaintiff was subjected to harassment and discrimination by the employees of the Defendant. Minorities working for the Defendant would routinely be subjected to racial jokes and slurs, threatened with knives, and denied advancement opportunities. Initially the harassment started with members of management being disrespectful towards minority employees. When Plaintiff complained to upper management about the discrimination he became a target of management.

The Plaintiff noticed that black employees were being treated less favorably with respect to promotions and other terms and conditions of employment. The Plaintiff began questioning management regarding the requirements and considerations for promotion and was never given a straight forward response. Plaintiff also became aware of another black employee who also expressed an interest in a promotion, but was advised that a promotion would never happen because of his race.

Plaintiff requested a meeting with upper management to address his concerns, and on April 11, 2012, a meeting was held with upper management; however, Plaintiff's concerns were

not taken seriously. On April 13, 2012 Plaintiff was suspended from employment.

### **RESPONDEAT SUPERIOR AND RATIFICATION**

8. Whenever in this complaint it is alleged that the Defendant, Roy Jorgensen Associates, Inc., did any act or thing, it is meant that the Defendant's officer's agents, servants, employees, or representatives did such act and/or that at the time such act was done, it was done with the full authorization or ratification of the Defendant or was done in the normal and routine course and scope of employment of Defendant's officer's, agents, servants, employees, or representatives.

### **CONSTRUCTIVE DISCHARGE**

9. Defendant made the working conditions so intolerable that Plaintiff felt compelled to resign his position. A reasonable person in the same position would have also felt compelled to resign. Plaintiff suffered damages for which Plaintiff herein sues.

### **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS BY DEFENDANT**

10. Defendant's conduct was extreme and outrageous and proximately caused Plaintiff severe emotional distress. Plaintiff suffered damages for which Plaintiff herein sues.

### **RETALIATION BY DEFENDANT**

11. Plaintiff alleges that Defendant instituted a campaign of retaliation. Which include:

- \* suspending Plaintiff;
- \* denying Plaintiff promotions; and
- \* intentionally reprimanded Plaintiff for acts he did not commit.

Plaintiff suffered damages for which Plaintiff herein sues.

### **DAMAGES**

12. Plaintiff sustained the following damages as a result of the actions and/or omissions of Defendant described hereinabove:

a. All reasonable and necessary Attorney's fees incurred by or on behalf of Plaintiff;

b. Back pay from the date that Plaintiff was denied equal pay for equal work and interest on the back pay in an amount to compensate Plaintiff as the Court deems equitable and just;

c. All reasonable and necessary costs incurred in pursuit of this suit;

d. Emotional pain and suffering;

e. Expert fees as the Court deems appropriate;

f. Front pay in an amount the Court deems equitable and just to make Plaintiff whole;

g. Inconvenience;

h. Interest;

i. Loss of enjoyment of life;

j. Mental anguish in the past[punctuation];

k. Mental anguish in the future;

l. Loss of earnings in the past;

m. Loss of benefits;

n. Humiliation.

#### **PRAYER**

**WHEREFORE, PREMISES CONSIDERED,** Plaintiff, Christopher Alexander Glover respectfully prays that the Defendant be cited to appear and answer herein, and that upon a final hearing of the cause, judgment be entered for the Plaintiff against Defendant for damages in an amount within the jurisdictional limits of the Court; together with interest as allowed by law; costs of court; and such other and further relief to which the Plaintiff may be entitled at law or in equity.

RESPECTFULLY SUBMITTED,

*R. Nicole Stagg* /s/

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**PLAINTIFF HEREBY DEMANDS TRIAL BY JURY**